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*Attorney for Plaintiff Michael Calkins*

UNITED STATES DISTRICT COURT

STATE OF NEVADA

MICHAEL CALKINS,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES,  
LLC, a foreign limited liability company; and  
EXPERIAN INFORMATION SERVICES,  
INC.

Defendants.

Case No.: 2:16-cv-02628 RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO MOTION FOR SUMMARY  
JUDGMENT  
(FIRST REQUEST)**

Pursuant to Local Rules IA 6-1, and IA 6-2, the parties, by and through their attorneys of record hereby stipulate and request the court as follows:

1. This is the first stipulation for extension of time to allow Plaintiff MICHAEL CALKINS ("Plaintiff") to respond to the Motion for Summary Judgment filed by Portfolio Recovery Associates, LLC., ("Defendant") on November 6, 2017. (ECF No. 34)

2. The Plaintiff's responsive pleading to the said Motion for Summary Judgment is due on November 27, 2017.

3. The parties agree to extend the Plaintiff's time to file a responsive pleading to Defendants' Motion for Summary Judgment in the above-caption matter from November 27, 2017 to December 4, 2017. Good cause exists for this request.

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1           4.       The extension is requested by Plaintiff's counsel due to a family emergency that has  
2 kept him out of the office, and therefore, counsel has been unable to attend to and respond to  
3 Defendants' Motion for Summary Judgment by November 27, 2017. This stipulation is not made for  
4 purposes of delay.

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6           IT IS SO STIPULATED.

7 Dated: this 27<sup>th</sup> day of November, 2017.  
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KRAVITZ, SCHNITZER, & JOHNSON,  
CHTD

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10 By: /s/ Gina M. Mushmeche

Gina M. Mushmeche  
Nevada Bar No. 10411  
8985 S. Eastern Avenue, Suite 200  
Las Vegas, NV 89123

*Attorneys for Defendant Portfolio Recovery  
Associates, LLC*

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14 Dated: this 27<sup>th</sup> day of November, 2017.  
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THE LAW OFFICE OF VERNON NELSON, PLLC

16 By: /s/ Vernon Nelson

Vernon Nelson  
Nevada Bar No. 6434  
9480 South Eastern Avenue, Suite 252  
Las Vegas, NV 89123

*Attorneys for Plaintiff Michael Calkins*

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20           IT IS SO ORDERED.

21 Dated: This 30<sup>th</sup> day of November, 2017.  
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RICHARD F. BOULWARE, II  
United States District Judge